

EXHIBIT 63

**SUMMARY REPORT FOR DATA COLLECTED UNDER
THE SUPPLEMENTAL REMEDIAL INVESTIGATION
QUALITY ASSURANCE PROJECT PLAN (SQAPP)
FOR LIBBY, MONTANA**

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**Prepared by
US Environmental Protection Agency
Region 8
Denver, CO**



**With Technical Assistance from:
Syracuse Research Corporation
Denver, CO**



3. Dust as a Predictor of Indoor Air Exposures

EPA began with the assumption that the main source of LA in indoor air was likely to be contaminated indoor dust that was resuspended into indoor air by human activity or by mechanical forces (e.g., air flow from a furnace). However, paired measurements of indoor air and indoor dust collected during the SQAPP did not reveal any clear relationship. The basis for this apparent lack of correlation is not known. EPA is presently collecting additional data on levels of LA in indoor air and indoor dust in order to determine if a relationship can be detected.

4. Levels of LA in Outdoor Ambient Air

One exposure pathway that applies to all people in Libby is inhalation of outdoor ambient air. Prior to the SQAPP, a total of 404 outdoor ambient air samples had been collected, but most of these were not analyzed with an analytical sensitivity needed to provide an accurate estimate of the true concentration. Therefore, as part of the SQAPP, a sub-set of 33 of these samples was selected for supplemental analysis to achieve an analytical sensitivity that was about 25 times lower than the original sensitivity. Comparing the original results to the re-analyses indicated that the estimated mean value decreased about 2-fold (from 0.00055 s/cc to 0.00021 s/cc), and uncertainty around each value narrowed substantially. However, these air samples were not collected in a way that ensured they were spatially or temporally representative, so EPA is currently collecting additional outdoor ambient air samples to provide a clearer assessment of the exposure that may occur via this pathway.

Other Findings

1. Transfer of Soil into Indoor Dust

EPA generally assumes that outdoor soil is an important contributor to indoor dust. That is, if outdoor soil is contaminated with LA, any soil that is tracked into the house may contaminate the indoor environment. The amount of soil transferred from outdoors to indoors varies from site to site, so during the SQAPP, EPA collected data to help quantify this transfer process at Libby. The data collected suggested that the amount of soil transferred to indoor dust depends upon the condition of the yard and the number of people and pets entering/exiting the home on a regular basis. On average, the transfer factor was about 0.002 g soil/cm². However, this transfer factor yields predicted levels of LA in indoor dust that are substantially higher than measured levels, indicating that the factor should not be used to predict indoor dust levels until the basis of the discrepancy is resolved.

2. LA Levels in Soil that are ND by PLM

As noted above, EPA uses a polarized light microscopy method referred to as "PLM-VE" to estimate levels of LA in soil in Libby. This is a semi-quantitative method that reports a sample as non-detect (ND) when the microscopist can not recognize any LA in the sample. However, from the studies of outdoor soil disturbance (see above), it is evident that soils that are ND can release LA fibers to air. For this reason, EPA used more powerful electron microscopic methods